McKesson Corporation
One Post Street, 34th Floor
San Francisco, CA 94104
608.848.4134 Tel

Jean A. Mescher
Director, Environmental Services

[redacted]

McKESSON
Empowering Healthcare

Via Electronic and Certified Mail

August 20, 2014

Mr. Stephen Tzhone, Superfund Remedial Project Manager
Superfund AR/LA Enforcement Section (6SF-RA)
U.S. Environmental Protection Agency
1445 Ross Avenue
Dallas, Texas 75202

Subject: Monthly Progress Report – July 2014
Arkwood, Inc. Site, Omaha, Arkansas

Dear Mr. Tzhone:

Pursuant to Section IX (B) of the corrected Consent Decree in this matter, the following letter report is Millbrook Distribution Services' (MMI) monthly progress report.

I. CURRENT ACTIVITIES

The following is a general description of Work (as defined in the Consent Decree) activities commenced or completed during this reporting period:

During July, we operated the main treatment system, collected operational samples and conducted Site maintenance activities. In addition to collecting samples for laboratory analysis of pentachlorophenol, field samples were collected to measure pH, temperature and dissolved oxygen. Water samples were collected on July 9, 2014. The analytical data was forwarded electronically to you and Mr. Mark Moix of the ADEQ at an earlier date and is also attached to this report. A summary of the data is attached for reference. Samples at the spring mouth and weir will continue to be collected once per month until a reduction in frequency is approved by the agency.

Since a Corrected Deed Notice and Restrictions for the Arkwood Site was recorded by Mr. Bud Grisham on May 29, 2014 reducing the restricted area from 30 acres to 18 acres, the placement of the eastern fence will be relocated to be consistent with the boundary of the 18-acre parcel. A cable has been temporarily installed across this boundary. Fencing is scheduled to be installed in October 2014, the earliest date available for the contractor.

Comments on the Revised Conceptual Site Model (CSM) and Supplemental Groundwater Tracing Study Work Plan (Tracing Study Plan) were received from the USEPA on July 18,

2014. A final CSM and Tracing Study Plan, along with a Sampling and Analysis Plan are due to be submitted on August 29, 2014.

II. PROJECT DATA
Attached.

III. PROJECTED ACTIVITIES
August: MMI plans to continue ongoing operations and Site maintenance activities. Responses to the USEPA comments on the revised CSM and Tracing Study Plan, along with the Sampling and Analysis Plan will be submitted by August 29, 2014.
September: MMI plans to continue ongoing operations and Site maintenance activities. Upon approval of the Sampling and Analysis Plan and Tracing Study Plan, scheduling and implementation of the work will commence.
October: MMI plans to continue ongoing operations and Site maintenance activities

IV. PROBLEMS ENCOUNTERED OR ANTICIPATED
None.

I certify that the information contained in or accompanying this submission is true, accurate, and complete to the best of my knowledge, information and belief, and that I, as project coordinator, have made reasonable inquiry into its veracity.

If you have any questions regarding this monthly progress report, please do not hesitate to contact me at (608) 848-4134.

Sincerely,

Jean A. Mescher, Project Coordinator
Director, Environmental Services

Enclosure

Copy:
- Mark Moix, ADEQ
- EPA Assistant Regional Counsel (6C-WA) (w/o enclosure)
- Chief, Superfund Enforcement Branch (6H-E) (w/o enclosure)

Arkansas Analytical Inc.

11701 I-30 Bldg 1, Ste 115 - Little Rock, AR 72209
501-455-3233 Fax 501-455-6118

18 July 2014

Jim Fleer
Oxford Environmental & Safety, Inc
14348 Nieman Rd.
Overland Park, KS 66221

RE: Arkwood Monthly Sampling

SDG Number: 1407146

Enclosed are the results of analyses for samples received by the laboratory on 11-Jul-14 09:35. If you have any questions concerning this report, please feel free to contact me.

Sample Receipt Information:

Custody Seals	✔
Containers Correct	✔
COC/Labels Agree	✔
Received On Ice	✔
Temperature on Receipt	2.0°C

Sincerely,

Norma James / Teresa Cains

Norma James
President

18 July 2014

Jim Fleer
Oxford Environmental & Safety, Inc
14348 Nieman Rd.
Overland Park, KS 66221
Project: Arkwood Monthly Sampling

Date Received: 11-Jul-14 09:35

ANALYTICAL RESULTS

Lab Number: **1407146-01**
Sample Name: **Mouth**
Date/Time Collected: **7/9/14 17:50**
Sample Matrix: **Water**

Semivolatiles	Units	Result	Qualifier(s)	Date/Time Analyzed	Batch	Method
Pentachlorophenol	ug/L	**87.1**		7/15/14 12:08	A407184	8270D, Rev 4, 2007
2,4,6-Tribromophenol [surr]	%	122		7/15/14 12:08	A407184	8270D, Rev 4, 2007
2-Fluorophenol [surr]	%	64.6		7/15/14 12:08	A407184	8270D, Rev 4, 2007
Phenol-d5 [surr]	%	45.7		7/15/14 12:08	A407184	8270D, Rev 4, 2007

ANALYTICAL RESULTS

Lab Number: **1407146-02**
Sample Name: **Weir**
Date/Time Collected: **7/9/14 17:35**
Sample Matrix: **Water**

Semivolatiles	Units	Result	Qualifier(s)	Date/Time Analyzed	Batch	Method
Pentachlorophenol	ug/L	< 1.00		7/15/14 12:30	A407184	8270D, Rev 4, 2007
2,4,6-Tribromophenol [surr]	%	83.4		7/15/14 12:30	A407184	8270D, Rev 4, 2007
2-Fluorophenol [surr]	%	34.0		7/15/14 12:30	A407184	8270D, Rev 4, 2007
Phenol-d5 [surr]	%	31.7		7/15/14 12:30	A407184	8270D, Rev 4, 2007

18 July 2014

Jim Fleer
Oxford Environmental & Safety, Inc
14348 Nieman Rd.
Overland Park, KS 66221
Project: Arkwood Monthly Sampling

Date Received: 11-Jul-14 09:35

QUALITY CONTROL RESULTS

Semivolatiles - Quality Control
Analyzed: 15-Jul-14 13:10 By: TB

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch A407184 - 3510C Modified										
Blank (A407184-BLK1)				Prepared & Analyzed: 15-Jul-14						
Pentachlorophenol	ND	1.00	ug/L							
Surrogate: 2,4,6-Tribromophenol	*48.2*		"	*40.0*		*121*	*45.3-139*			
Surrogate: 2-Fluorophenol	*26.8*		"	*40.0*		*66.9*	*28.9-81.6*			
Surrogate: Phenol-d5	*18.8*		"	*40.0*		*47.0*	*8.43-107*			
LCS (A407184-BS1)				Prepared & Analyzed: 15-Jul-14						
Pentachlorophenol	40.2	1.00	ug/L	40.0		101	44.6-120			
Surrogate: 2,4,6-Tribromophenol	*46.5*		"	*40.0*		*116*	*60.1-131*			
Surrogate: 2-Fluorophenol	*26.9*		"	*40.0*		*67.4*	*30.7-98.1*			
Surrogate: Phenol-d5	*19.7*		"	*40.0*		*49.3*	*22.7-123*			
Matrix Spike (A407184-MS1)	**Source: 1407146-01**			Prepared & Analyzed: 15-Jul-14						
Pentachlorophenol	162	2.00	ug/L	80.0	87.1	93.2	31-128			
Surrogate: 2,4,6-Tribromophenol	*86.2*		"	*80.0*		*108*	*43-136*			
Surrogate: 2-Fluorophenol	*50.9*		"	*80.0*		*63.7*	*23.6-97.1*			
Surrogate: Phenol-d5	*37.1*		"	*80.0*		*46.4*	*12.8-122*			
Matrix Spike Dup (A407184-MSD1)	**Source: 1407146-01**			Prepared & Analyzed: 15-Jul-14						
Pentachlorophenol	178	2.00	ug/L	80.0	87.1	114	31-128	9.77	22.7	
Surrogate: 2,4,6-Tribromophenol	*82.7*		"	*80.0*		*103*	*43-136*			
Surrogate: 2-Fluorophenol	*49.3*		"	*80.0*		*61.6*	*23.6-97.1*			
Surrogate: Phenol-d5	*36.1*		"	*80.0*		*45.1*	*12.8-122*			

All Analysis performed according to EPA approved methodology when available:
SW 846, Revised December, 1996; EPA 600/4-79-020, Revised March, 1983; Standard Methods.
Instrument calibration and quality control samples performed at or above frequency specified in analytical method.

Reviewed by: Norma James / Teresa Coins

Norma James and/or Teresa Coins
Technical Director and/or QA Officer

Arkansas Analytical Inc.

11701 Interstate 30, Bldg. 1, Ste. 115
Little Rock, AR 72209
PHONE: 501-455-3233
FAX: 501-455-6118

CHAIN OF CUSTODY RECORD

CLIENT INFORMATION	Project Description	Turnaround Time
Oxford Environmental & Safety, Inc.	Arkwood Monthly Sampling	1 Day (100%)
14348 Nieman Rd.		2 Day (50%)
Overland Park KS 66221	Reporting Information	3 Day (25%)
	Telephone: 913-706-3422	5 Day (Routine)
Attn: Jim Fleer	Email: jfleer@oxfordeands.com	Preservative Code:
		Bottle Type:

Preservation Codes:

1. Cool, 4 Degrees Centigrade
2. Sulfuric Acid (H_2SO_4), pH < 2
3. Nitric Acid (HNO_3), pH < 2
4. Thiosulfate for Dechlorination
5. Hydrochloric Acid(HCl)
6. Sodium Hydroxide (NaOH), pH > 12

Sampler(s) Signature: [signature]

Sampler(s) Printed: James E. Fleer

Field Number	SAMPLE COLLECTION Date/s	Time/s	Grab	Comp	Number of Bottles	Sample Matrix	SAMPLE IDENTIFICATION/ DESCRIPTION	Pentachlorophenol (8270D)	Bottle Type Code	Arkansas Analytical Work Order Number:
	7/9/14	17:50	X		2	Water	Mouth	X		1407146-01
	7/9/14	17:35	X		2	Water	Weir	X		02

TEST PARAMETERS

Bottle Type Code: G = Glass; P = Plastic; V = Septum; A = Amber

ONSITE MEASUREMENTS BY Oxford Environmental

	pH	Temperature	DO%
Weir ~~Mouth~~	7.39	17.41	202.0
Mouth ~~Weir~~	6.35	13.95	41.8

1. Relinquished by: (Signature)	Date/Time	2. Received by: (Signature)
[signature]	7/10/2014 9:30	UPS
3. Relinquished by: (Signature)	Date/Time	4. Received by lab: (Signature)
UPS	7-11-14, 0935	Sydney James

SAMPLE CONDITION UPON RECEIPT IN LAB

1. CUSTODY SEALS: ✓ Yes ___ No
2. CONTAINERS CORRECT: ✓ Yes ___ No
3. COC/LABELS AGREE: ✓ Yes ___ No
4. RECEIVED ON ICE: ___ Yes ___ No
5. TEMPERATURE ON RECEIPT: 2°C
6. TEMPERATURE GUN ID: HHT #2

FOR COMPLETION BY LAB ONLY

REMARKS / SAMPLE COMMENTS

Flow Rate - 2.32
O_3 Power - 20%
O_3 Conc - 2.11%
O_3 Residual - 3.55

Arkwood, Inc. Site: Ozone Injection Pilot Study

	Variables		Spring	PCP	
Date	Water Inj	O3 Inj	Flow	Mouth	Weir
12/8/05			5		
12/9/05	35		5		
12/14/05	35	1lb/10 g	21	28	
12/15/05	35	1lb/10 g	30/27	29.3	
12/20/05	36	1lb/10 g	27	7.39	<5.10
12/26/05	36	1lb/10 g	27	11.4	11.1
1/2/06	36	1lb/10 g	21	42.4	35.1
1/9/06	36	1lb/10 g	20	32.4	33
1/16/06	36	1lb/10 g	27.5	32.3	<5.00
1/23/06	36	1lb/10 g	34/32	15.9	<5.00
1/30/06	36	1lb/10 g	41	34.3	<5.00
2/6/06	36	1lb/10 g	38	<5.10	<5.00
2/13/06	36	1lb/10 g	34	23.9	<5.00
2/20/06	36	1lb/10 g	21	5.53	4.19J
2/27/06	36	1lb/10 g	26	19.9	<5.00
3/6/06	34	1-2lb/10 g	16	25.1	<5.00
3/13/06	33	1-2lb/10 g	57	107	<5.00
3/20/06	32	1-2lb/10 g	48	26.2	<5.00
3/27/06	32	1-2lb/10 g	27	4.09J	<5.00
4/3/06	34	2-3lb/10 g	24	11.3	<5.00
4/10/06	33	2-3lb/10 g	16.4	39.3	<5.00
4/17/06	34	2-3lb/10 g	22	7.94	7.82
4/24/06	35	2-3lb/10 g	16	7.0	<5.00
4/27/06	33	2-3lb/10 g	50	11.3	NA
4/29/06	33	2-3lb/10 g	193	28.2	NA
5/1/06	33	2-3lb/10 g	94	23.4	7.16
5/8/06	33	2-3lb/10 g	59	52.3	23.3
5/15/06	34	2-3lb/10 g	21.7	14.9	<5.00
5/22/06	34	2-3lb/10 g	16	<5.00	<5.00
5/30/06	34	2-3lb/10 g	16.7	5.64	<5.00
6/7/06	0	0	3	253	<5.00
6/12/06	0	0	2.19	LE	LE
6/19/06	34	0	16.7	52.1	14.3
6/26/06	34	0	16.7	74.7	<5.00
7/5/06	35	0	21.7	9.8	<5.00
7/17/06	34	0	16.7	21.9	4.01J
8/7/06	34	0	16.7	23.6	18
8/14/06	34	0	16.7	<5.00	5.22
9/5-6/06	34	0	23	6.57	<5.10
9/18/06	34	0	24	6.29	<5.00
10/2/06	34	0	24	16.8	<5.00
10/16/06	34	2-3lb/10 g	41	39.6	2.22J
10/16/06	34	5-6lb/10g	81	92.3	19.4
10/18/06	34	5-6lb/10g	27	118	<5.00
11/7/06	35	2-4lb/10g	41	52.7	4.70J
11/20/06	35	2-4lb/10g	24	57.4	<5.00
11/30/06	35	5-6lb/10g	636	<50.0	<5.00
12/4/06	35	5-6lb/10g	59	<54.3	<5.00
12/6/06	35	5-6lb/10g	37	<52.6	<5.00
12/18/06	35	2-3lb/10 g	21	24.1	<5.00
1/8/07	35	2-3lb/10 g	21	16.7	<5.00
1/22/07	35	2-3lb/10 g	79	34.6	<5.00
2/5/07	35	2-3lb/10 g	27	25.9	<5.00
2/19/07	35	2-3lb/10 g	47	19.6	<5.00
3/5/07	35	2-3lb/10 g	27	<5.00	<5.00
3/19/07	35	2-3lb/10 g	25	NA	NA
4/9/07	35	2-3lb/10 g	23	<5.00	<5.00
4/23/07	35	2-3lb/10 g	30	7.27	<5.00
5/7/07	35	2-3lb/10 g	21	2.90J	<5.00
5/21/07	35	2-3lb/10 g	20	4.36J	<5.00
6/4/07	35	2-3lb/10 g	20	<5.00	<5.00
6/18/07	35	0	21	9.62	<5.00
7/9/07	35	0	20	15.0	<5.00

7/23/07	35	0	18	8.65	<5.00
8/6/07	0	0	1	191	9.19
9/10/07	35	0	23	217	26.4
9/24/07	35	0	18	16.2	19.4
10/10/07	35	2-3lb/10 g	18	5.63	1.15J
10/22/07	35	2-4lb/10g	18	1190	53.7
11/5/07	35	2-4lb/10g	18	209	7.93
11/19/07	35	2-4lb/10g	18	19.8	24.1
12/3/07	35	2-4lb/10g	18	20.1	<5.00
12/17/07	36	2-4lb/10g	32	87.4	1.20J
1/7/08	36	2-4lb/10g	23	<5.00	<5.00
1/21/08	36	2-4lb/10g	23	58	<5.00
2/4/08	36	2-4lb/10g	24	52	<5.00
2/18/08	35	2-4lb/10g	83	57	15
3/3/08	35	5-6lb/10g	580	<5.00	<5.00
3/17/08	35	5-6lb/10g	44	11	<5.00
4/7/08	35	5-6lb/10g	78	10	<5.00
4/12/08	35	5-6lb/10g	240	6.5	NA
4/13/08	35	5-6lb/10g	100	6.8	NA
4/14/08	35	5-6lb/10g	78	8.2	NA
5/10/08	36	5-6lb/10g	68	75	<5.00
5/27/08	0	0	18	189	<5.00
6/9/08	35	2-4lb/10g	30	77	<5.00
6/23/08	35	2-4lb/10g	580	5.6	<5.00
7/7/08	35	2-4lb/10g	80	194	189
7/10/08	35	5-6lb/10g	140	254	20
7/21/08	35	5-6lb/10g	42	477	<5.00
8/4/08	35	2-4lb/10g	22	108	14
8/18/08	35	2-4lb/10g	36	31	<5.00
9/1/08	35	2-4lb/10g	25	32	<5.00
9/22/08	35	2-4lb/10g	40	22	<5.00
10/6/08	35	2-4lb/10g	21	20	<5.00
10/20/08	33	2-4lb/10g	21	13	<5.00
11/3/08	35	2-4lb/10g	24	<5.00	<5.00
11/17/08	35	2-4lb/10g	30	28	<5.00
12/1/08	35	2-4lb/10g	24	12	<5.00
12/22/08	33	2-4lb/10g	24	<5.00	<5.00
1/5/09	35	2-4lb/10g	32	7.3	<5.00
1/26/09	32	2-4lb/10g	27	<5.00	<5.00
2/9/09	33	2-4lb/10g	90	<5.00	<5.00
2/23/09	33	2-4lb/10g	31	6	<5.00
3/9/09	34	2-4lb/10g	30	5.7	<5.00
3/23/09	33	2-4lb/10g	30	<5.00	<5.00
4/6/09	32	2-4lb/10g	38	5.8	<5.00
4/20/09	32	2-4lb/10g	243	8.5	<5.00
5/4/09	33	2-4lb/10g	343	8.2	8.7
5/18/09	33	2-4lb/10g	51	6.2	<5.00
6/8/09	35	2-4lb/10g	38	<5.00	<5.00
6/29/08	33	2-4lb/10g	25	9.1	<5.00
7/20/09	32	2-4lb/10g	47	39	<5.00
8/10/09	32	2-4lb/10g	23.7	31	<5.00
9/13/09	32	0	22	8	<5.00
10/12/09	32	0	104	21	<5.00
11/9/09	32	0	45	<50	<5.00
12/7/09	32	0	28	8.2	<5.00
1/10/10	32	0	42	13	<5.00
2/15/10	32	0	87	11.1	<5.00
3/15/10	32	0	35	<5.00	<5.00
4/15/10	32	0	40	9.62	<5.00
5/17/10	32	0	180	11	<5.00
6/13/10	32	0	43	15	<5.00
7/8/10	32	0	33	66	<2
8/19/10	0-20	0	17	16.3	<5.00
9/21/10	34	0	33	28.2	<5.00
10/18/10	37	0	20	14.9	<10.00
11/20/10	37	0	21	4.89	<4.00
12/16/10		0	23.55	6.15	<5.00

1/18/11	37	0	22.83	3.39	2.86
2/9/11	37	0	26.76	10.4	<10.0
3/17/11	37	0	49.03	14.2	<5.00
4/19/11	37	0	57.55	12.5	<5.00
5/2/11			310	11	
5/3/11			271	8.92	
5/4/11			156	10.8	
5/4/11			123	15.8	
5/5/11			83	18	
5/9/11	37	0	33.91	43.8	<5.00
6/9/11	0	0	6.8	52.4	<5.00
7/18/11	0	0	0.575	18.6	<5.00
8/15/11	0	0	1.004	38.9	<5.00
9/13/11	0	0	0.132	<5.00	<5.00
10/18/11		0	23.71	52.4	<5.00
11/16/11		0	29.64	30.6	<5.00
12/19/11		0	60.25	11.5	<5.00
1/19/12	40	0	31.82	<5.00	<5.00
2/14/12	40	0	40.38	6.68	<5.00
3/29/12	40	0	50.81	7.95	<5.00
4/18/12	40	0	22.54	20	<5.00
5/23/12	40	0	18.18	10.9	<5.00
6/11/12	40	0	17.87	7.13	<5.15
7/30/12	40	0	15.1	5.68	<5.00
8/24/12	40	0	13.75	<5.00	<5.00
9/24/12	0	0	0.4	73.2	<5.00
10/15/12	0	0	4.48	26.7	<5.00
11/19/12	0	0	0.73	28.8	<5.00
12/28/12	0	0	1.22	25	<1.00
1/16/13	0	0	3.72	40.5	2.12
2/24/13	0	0	4.1	45.3	<1.00
3/13/13	0	0	23	18.6	<1.00
4/22/13	0	0	21.62	26.7	<1.00
5/16/13	0	0	14.33	18.3	<1.00
6/21/13	0	0	1.44	22.3	<1.00
7/23/13	0	0	0.934	27.1	<1.00
8/23/13	0	0	5.27	65.4	<1.00
9/18/13	0	0	1.43	54.6	<1.00
10/16/13	0	0	1.63	66.1	<1.00
11/13/13	0	0	2.68	115	1.71
12/18/13	0	0	43.77	33	1.28
1/13/14	0	0	48.39	45.8	2.55
2/17/14	0	0	6.1	75.4	<1.00
3/17/14	0	0	151.5	12.8	2.47
4/23/14	0	0	11.26	49.4	<1.00
5/19/14	0	0	56.62	73.9	<1.00
6/4/14	0	0	2.45	65.7	<1.00
7/9/14	0	0	2.32	87.1	<1.00

Weir Parameters

pH	Temp	DO %	Distance	
7.46	17.57	341.9	12	
7.07	16.08	216.4	15	
7.85	15.4	209.1	12	
7.91	12.46	247.6	12	
6.41	13.08	241.1	12	
6.71	14.26	256.3	12	
7.63	14.02	190.7	12	
6.72	14.36	214.3	12	
6.52	14.66	226.8	12	
6.69	18.26	238	12	
7.76	19.74	249.7	12	
6.92	18.33	238.2	12	
7.72	18.85	196.5	12	
8.03	15.9	204.7	12	
7.25	11.72	236.4	12	
6.65	13.99	25.92*	12	measured as mg/L not as % DO
7.13	12.36	236.7	12	
6.47	13.61	259.6	12	
7.1	13.4	121.6	12	Very heavy flow rate
6.36	14.88	218.7	12	
7.34	15.97	219.1	12	
6.68	17.49	205.1	12	
7.39	17.41	202	12	

NOTES: Flow rates in gallons per minute (gpm)
O3 injection rates in pounds per 10 gallons
PCP concentrations in parts per billion (ppb)
NA - not analyzed
LE - Lab Error - samples not usable